

MEMORANDUM

To: Valmichael Leos and Anne Foster, USEPA **Date:** March 12, 2015
From: Wendell Mears, David Keith, John Verduin, **Project:** 090557-01.06
and John Laplante
Cc: Gary Miller, USEPA, Dave Moreira and
Andrew Shafer, MIMC
Phil Slowiak, IP
Re: San Jacinto River Waste Pits TCRA Debris Removal Completion Report

INTRODUCTION

This document provides a summary of debris removal activities atop the Time Critical Removal Action (TCRA) cap at the San Jacinto River Waste Pits (SJRWP) Superfund Site (TCRA Site). Respondents reported the presence of the debris to the U.S. Environmental Protection Agency (USEPA) on Monday, February 23, 2015.

BACKGROUND

The TCRA was implemented by the Respondents, International Paper Company and McGinnes Industrial Maintenance Corporation (collectively, Respondents) under an Administrative Settlement Agreement and Order on Consent (AOC) with the USEPA – Docket No. 06-12-10, effective May 17, 2010 (USEPA 2010). A description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Revised Draft Final Removal Action Completion Report¹ (RACR; Anchor QEA 2012)

The inspection activities summarized in this document were conducted in accordance with the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2011b (see footnote 1)). A visual inspection was conducted on February 23,

¹ David Keith, the Respondents' the Project Coordinator, received a revised RACR from Valmichael Leos via email on August 15, 2012; however, the appendix to the RACR including the Operations, Monitoring, and Maintenance Plan, was not provided and is assumed to remain unchanged. Respondents reserve all rights related to the changes made by USEPA to the Revised Draft Final RACR.

2015 that showed a boat hull was sitting atop the east cell cap (see Figure 1). After notifying the USEPA (see Attachment 1), the Respondents contracted to remove and dispose of the boat hull after reviewing their Health and Safety Plan (HASP), Site access plan, and insurance certificates. Following coordination with the Texas Department of Transportation (TXDOT); the boat hull was removed on Thursday, February 26, 2015 and disposed in a local landfill. The hull was winched atop the central berm, winched onto the stable berm parallel to the west cell and then pulled to the TXDOT right-of-way for loading. The cap was visually inspected for damage; no damages were identified after removing the debris.

FIGURES

Figure 1 Approximate Debris Location

ATTACHMENTS

Attachment 1 – Email Notifying USEPA

Attachment 2 – Photograph Log TCRA Debris Removal

REFERENCES

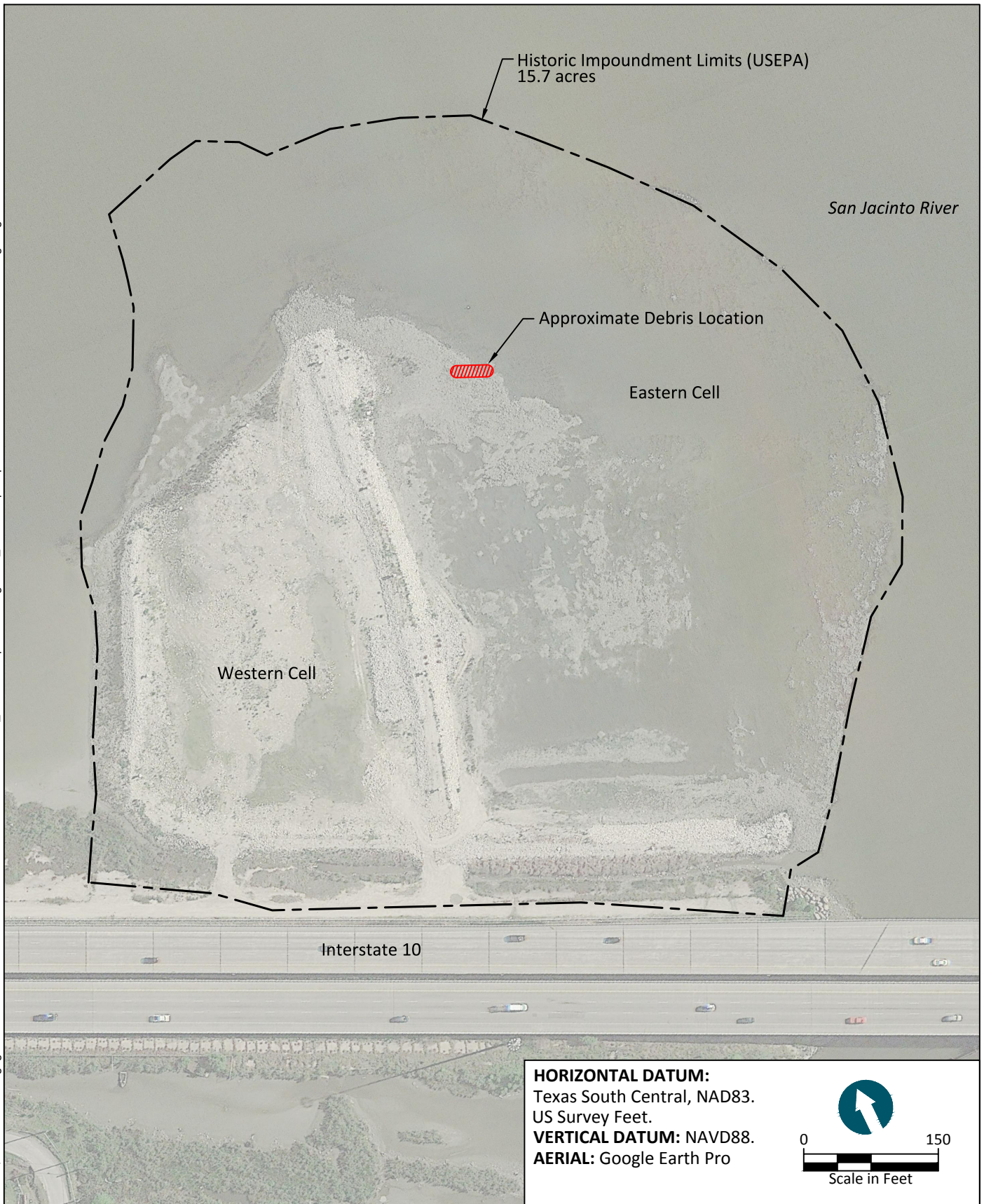
Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. November 2010.

Anchor QEA, 2011. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency (USEPA) Region 6. Revised March 2012.

FIGURES

K:\Jobs\090557-San Jacinto\090557-01 - San Jacinto\ SURWP Cap Monitoring SAP\ TCRA Cap Repair\09055701-TCRA SITE MAP-006.dwg Figure 1
Mar 03, 2015 11:53am tgriga



ATTACHMENT 1
EMAIL NOTIFYING USEPA

From: [David Keith](#)
To: [Gary Miller \(miller.garyg@epa.gov\)](#); [Valmichael Leos](#)
Cc: [Dave Moreira \(dmoreira@wm.com\)](#); [Phil Slowiak](#); [Wendell Mears](#); [John Laplante](#); [John Verduin](#)
Subject: San Jacinto Cap
Date: Monday, February 23, 2015 5:04:26 PM
Attachments: [23 Feb 2015 San Jacinto Photos.pdf](#)

Gary and Valmichael – To follow up on my phone call from earlier today, the attached provides pictures of the derelict skiff that was left on top of the cap by tides recently. There is no damage to the cap and we are in the process of finding a contractor to have it removed as soon as is practical. We just wanted to give you a heads up and will keep you apprised of our actions.

Please don't hesitate to contact me if you have any concerns.

Thank you,
David

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ATTACHMENT 2
PHOTOGRAPH LOG
TCRA DEBRIS REMOVAL



Photograph 1: Atop central berm. Looking northeast slope.



Photograph 2: Standing on east cell looking southeast.



Photograph 3: Standing on east cell cap, looking north.



Photograph 4: Post removal, looking southeast.



Photograph 5: Standing atop central berm looking east and north at removal location.



Photograph 6: Northeast corner of western cell, looking south along central berm.



Photograph 7: South berm looking northwest and showing haul route.



Photograph 8: Debris loaded on trailer for transport to disposal facility.